
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Edward S. Kiel
v. :
AZEEZ ADEBARI : Mag. No. 21-15132
: **CRIMINAL COMPLAINT**
:

I, Michael Leung, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Michael Leung
Special Agent, Homeland Security
Investigations

Special Agent Leung attested to the Complaint by telephone pursuant to FRCP 4.1(b)(2)(A) in the District of New Jersey, on May 3, 2021

HONORABLE EDWARD S. KIEL
UNITED STATES MAGISTRATE JUDGE



Edward S. Kiel
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Distribute Khat)

On or about May 3, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

AZEEZ ADEBARI,

knowingly and intentionally conspiring with at least one other to distribute and to possess with intent to distribute a quantity of a mixture or substance containing cathinone, a Schedule I controlled substance, and cathine, a Schedule IV controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Michael Leung, am a Special Agent with Homeland Security Investigations. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about April 21, 2021, members of the United States Customs and Border Protection ("CBP") identified a freight container that had arrived in Newark, New Jersey. Based upon their training and experience, the unusual packaging and smell emanating from the package indicated the presence of a substance known as "khat." Upon information and belief, "khat" is a shrub that is abused for its stimulant-like effects and contains two active ingredients that are controlled substances: cathinone, a Schedule I controlled substance, and cathine, a Schedule II controlled substance. CBP seized the shipment and ultimately recovered what appeared to be plastic bags that contained a green leafy material of suspected "khat." CBP determined that the shipment contained more than 430 kilograms of suspected "khat" (the "Khat Shipment") in gross weight.

2. According to the shipping manifest and/or other customs paperwork, the listed consignee of the Khat Shipment is the defendant, Azeez Adebari ("ADEBARI") with an address in York, Pennsylvania and a telephone number ("ADEBARI's Phone Number"). Based upon the investigation to date, and law enforcement's review of at least one database available to law enforcement, law enforcement determined that the address and telephone number are associated with ADEBARI.

3. The shipping manifest and/or other customs paperwork described the Khat Shipment in sum and substance as clothing, grinded melon, grinded pepper, and hair attachments.

4. From on or about April 28, 2021, to on or about May 3, 2021, law enforcement and/or agents working at the direction of law enforcement communicated with ADEBARI on ADEBARI's Phone Number to arrange for ADEBARI to pick up the Khat Shipment.

5. On or about May 3, 2021, ADEBARI arrived at Newark International Airport and completed certain customs paperwork to obtain the release of the Khat Shipment. Subsequently, a male individual ("INDIVIDUAL-1") arrived with a transportation vehicle, and INDIVIDUAL-1 and ADEBARI began to load the

Khat Shipment into the vehicle.

6. Law enforcement then placed ADEBARI under arrest. Based upon the investigation to date, law enforcement understands that the transport vehicle had been hired to take the Khat Shipment to an address in Newark, New Jersey.

7. At the time of his arrest, ADEBARI possessed identification reflecting the same address as listed on the paperwork associated with the Khat Shipment.

8. On or about April 23, 2021, CBP contacted a botanist, who conducted an examination of a sample of the suspected "khat" and confirmed the substance is "khat." Based upon my training and experience, I understand that "khat" contains cathinone, a Schedule I controlled substance, and cathine, a Schedule II controlled substance.

9. After being *Mirandized*, Defendant advised law enforcement that he was picking up the shipment on behalf another individual(s) in exchange for monetary payment. He denied knowing that the shipment contained illegal controlled substances.